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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

FUJITSU LIMITED,)
)
 Plaintiff,)
)
 v.)
)
 BELKIN INTERNATIONAL, INC.; BELKIN,)
 INC.; D-LINK CORPORATION; D-LINK)
 SYSTEMS, INC.; and NETGEAR, INC.,)
)
 Defendants.)
)
 _____)

Case No.: 10-CV-03972-LHK

VERDICT FORM

Dated: December 13, 2012



LUCY H. KOH
United States District Judge

1 When answering the following questions and filling out this Verdict Form, please follow the
2 directions provided throughout the form. Your answers to each question must be unanimous.
3 Some of the questions contain legal terms that are defined and explained in detail in the Jury
4 Instructions. Please refer to the Jury Instructions if you are unsure about the meaning or usage
5 of any legal term that appears in the questions below.

6 Throughout this form, “Fujitsu” refers to Plaintiff Fujitsu Limited; “Belkin” refers to
7 Defendants Belkin International, Inc. and Belkin, Inc.; “D-Link Corporation” refers to
8 Defendant D-Link Corporation; “D-Link Systems” refers to Defendant D-Link Systems, Inc.;
9 and “NETGEAR” refers to Defendant NETGEAR, Inc.

10 We, the jury, unanimously agree to the answers to the following questions and return them
11 under the instructions of this Court as our verdict in this case.

12
13 **FUJITSU’S INDUCED INFRINGEMENT CLAIMS**
14 **AGAINST BELKIN, D-LINK SYSTEMS, D-LINK CORP., AND NETGEAR**

15 (These questions should be answered regardless of your findings with respect to the validity or
16 invalidity of the claims of the patent.)

17 **1a. For each product below, has Fujitsu proven by a preponderance of the evidence
18 that Belkin induced infringement of the claims below?**

19 Please answer in each box with a “Y” for “yes” (for Fujitsu), or with an “N” for “no”
20 (for Belkin).

Product	Claim 20	Claim 47	Claim 48
Belkin F5D7230 Router			
Belkin F5D8230 Router			
Belkin F5D6130 Router			
Belkin F5D8236 Router			

21 **1b. For each product below, has Fujitsu proven by a preponderance of the evidence
22 that D-Link Systems induced infringement of the claims below?**

23 Please answer in each box with a “Y” for “yes” (for Fujitsu), or with an “N” for “no”
24 (for D-Link Systems).

Product	Claim 20	Claim 47	Claim 48
D-Link DI-524 Router			
D-Link DWL-900AP+ Access Point			
D-Link DWL-1000AP Access Point			
D-Link DWL-2100AP Access Point			

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1c. For each product below, has Fujitsu proven by a preponderance of the evidence that D-Link Corporation induced infringement of the claims below?

Please answer in each box with a “Y” for “yes” (for Fujitsu), or with an “N” for “no” (for D-Link Corporation).

Product	Claim 20	Claim 47	Claim 48
D-Link DI-524 Router			
D-Link DWL-900AP+ Access Point			
D-Link DWL-1000AP Access Point			
D-Link DWL-2100AP Access Point			

1d. For each product below, has Fujitsu proven by a preponderance of the evidence that NETGEAR induced infringement of the claims below?

Please answer in each box with a “Y” for “yes” (for Fujitsu), or with an “N” for “no” (for NETGEAR).

Product	Claim 20	Claim 47	Claim 48
NETGEAR WGR614 Router			
NETGEAR WAB102 Access Point			
NETGEAR ME102 Access Point			
NETGEAR WNR834B Router			

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DEFENDANTS' INVALIDITY DEFENSES

(These questions should be answered regardless of your findings with respect to inducement.)

ANTICIPATION

2a. For each claim below, have Defendants proven by clear and convincing evidence that the claim is anticipated by a single prior art reference?

- Claim 2 No _____ (for Fujitsu) Yes _____ (for Defendants)
- Claim 4 No _____ (for Fujitsu) Yes _____ (for Defendants)
- Claim 20 No _____ (for Fujitsu) Yes _____ (for Defendants)
- Claim 41 No _____ (for Fujitsu) Yes _____ (for Defendants)
- Claim 47 No _____ (for Fujitsu) Yes _____ (for Defendants)
- Claim 48 No _____ (for Fujitsu) Yes _____ (for Defendants)

OBVIOUSNESS

2b. For each claim below, have Defendants proven by clear and convincing evidence that the claim would have been obvious to a person of ordinary skill in the art as of April 30, 1991?

- Claim 2 No _____ (for Fujitsu) Yes _____ (for Defendants)
- Claim 4 No _____ (for Fujitsu) Yes _____ (for Defendants)
- Claim 20 No _____ (for Fujitsu) Yes _____ (for Defendants)
- Claim 41 No _____ (for Fujitsu) Yes _____ (for Defendants)
- Claim 47 No _____ (for Fujitsu) Yes _____ (for Defendants)
- Claim 48 No _____ (for Fujitsu) Yes _____ (for Defendants)

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DAMAGES TO FUJITSU (IF APPLICABLE)

3. What is the total dollar amount that Fujitsu is entitled to receive from Belkin for its infringement of the asserted claims of the patent?

\$_____.

3a. For the total dollar amount in your answer to Question 3, please provide the breakdown for direct infringement by product below.

Product	Royalty Rate	Damages Amount
Belkin F5D7010 Card		
Belkin F5D8010 Card		
Belkin F5D6020 Card		
Belkin F5D9013 Kit		

3b. For the total dollar amount in your answer to Question 3, please provide the breakdown for induced infringement by product below.

Product	Royalty Rate	Damages Amount
Belkin F5D7230 Router		
Belkin F5D8230 Router		
Belkin F5D6130 Router		
Belkin F5D8236 Router		

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4. What is the total dollar amount that Fujitsu is entitled to receive from D-Link Systems for its infringement of the asserted claims of the patent?

\$_____.

4a. For the total dollar amount in your answer to Question 4, please provide the breakdown for direct infringement by product below.

Product	Royalty Rate	Damages Amount
D-Link DWL-G630 Card		
D-Link DWL-650+ Card		
D-Link DWL-650 Card		
D-Link DWL-923 Kit		

4b. For the total dollar amount in your answer to Question 4, please provide the breakdown for induced infringement by product below.

Product	Royalty Rate	Damages Amount
D-Link DI-524 Router		
D-Link DWL-900AP+ Access Point		
D-Link DWL-1000AP Access Point		
D-Link DWL-2100AP Access Point		

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5. What is the total dollar amount that Fujitsu is entitled to receive from D-Link Corporation for its infringement of the asserted claims of the patent?

\$_____.

5a. For the total dollar amount in your answer to Question 5, please provide the breakdown for direct infringement by product below.

Product	Royalty Rate	Damages Amount
D-Link DWL-G630 Card		
D-Link DWL-650+ Card		
D-Link DWL-650 Card		
D-Link DWL-923 Kit		

5b. For the total dollar amount in your answer to Question 5, please provide the breakdown for induced infringement by product below.

Product	Royalty Rate	Damages Amount
D-Link DI-524 Router		
D-Link DWL-900AP+ Access Point		
D-Link DWL-1000AP Access Point		
D-Link DWL-2100AP Access Point		

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6. What is the total dollar amount that Fujitsu is entitled to receive from NETGEAR for its infringement of the asserted claims of the patent?

\$ _____.

6a. For the total dollar amount in your answer to Question 6, please provide the breakdown for direct infringement by product below.

Product	Royalty Rate	Damages Amount
NETGEAR WG511 Card		
NETGEAR WAB501 Card		
NETGEAR MA401 Card		
NETGEAR WGB511 Kit		

6b. For the total dollar amount in your answer to Question 6, please provide the breakdown for induced infringement by product below.

Product	Royalty Rate	Damages Amount
NETGEAR WGR614 Router		
NETGEAR WAB102 Access Point		
NETGEAR ME102 Access Point		
NETGEAR WNR834B Router		

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FUJITSU’S WILLFUL INFRINGEMENT CLAIMS
AGAINST BELKIN, D-LINK SYSTEMS, D-LINK CORPORATION, AND NETGEAR

(This question should be answered if you find any of the claims of the patent to be valid.)

7. Has Fujitsu proven by clear and convincing evidence that Belkin’s infringement of the patent was willful?

Yes _____ (for Fujitsu) No _____ (for Belkin)

8. Has Fujitsu proven by clear and convincing evidence that D-Link Systems’s infringement of the patent was willful?

Yes _____ (for Fujitsu) No _____ (for D-Link Systems)

9. Has Fujitsu proven by clear and convincing evidence that D-Link Corporation’s infringement of the patent was willful?

Yes _____ (for Fujitsu) No _____ (for D-Link Corporation)

10. Has Fujitsu proven by clear and convincing evidence that NETGEAR’s infringement of the patent was willful?

Yes _____ (for Fujitsu) No _____ (for NETGEAR)

You have now reached the end of the verdict form and should review it to ensure it accurately reflects your unanimous determinations. The Jury Foreperson should then sign and date the verdict form in the spaces below and notify the Bailiff that you have reached a verdict. The Jury Foreperson should retain possession of the verdict form and bring it when the jury is brought back into the courtroom.

DATED: _____, 2012

By: _____
Jury Foreperson